

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE SULFURIC ACID	:	
ANTITRUST LITIGATION	:	MDL Docket No. 1536
	:	
_____	:	Case No. 03 C 4576
	:	
This Document Relates To:	:	Honorable Chief Judge James F. Holderman
	:	
<u>ALL RELATED ACTIONS</u>	:	Honorable Magistrate Judge Jeffrey Cole
	:	

NOTICE OF MOTION

TO: All Counsel of Record

PLEASE TAKE NOTICE THAT on Tuesday, December 13, 2011 at 9:00 a.m., or as soon thereafter as counsel may be heard, we shall appear before the Honorable Chief Judge James F. Holderman, or any other judge sitting in his place and stead, at the Dirksen Federal Building, 219 South Dearborn Street, Room 2541, Chicago, Illinois 60604, and then and there present the attached Defendants' Rule 16 Motion to Simplify Issues With Respect to the Rule of Reason Trial, at which time and place you may appear if you so see fit.

By: /s/ David C. Gustman
Attorney for Noranda, Inc., Falconbridge
Limited and NorFalco LLC

David C. Gustman
Jeffery M. Cross
John Z. Lee
Jill C. Anderson
FREEBORN & PETERS LLP
311 South Wacker Drive, Suite 3000
Chicago, IL 60606
*Attorneys for Noranda Inc., Falconbridge
Limited, and NorFalco LLC, and on
Behalf of Defendants Koch Sulfur
Products Company, Koch Sulfur
Products Company, LLC, Intertrade
Holdings, Inc. and Pressure Vessel
Services, Inc. for this limited purpose only*

Dated: December 8, 2011

CERTIFICATE OF SERVICE

The undersigned, one of the attorneys for Noranda, Inc., Falconbridge Limited and NorFalco LLC, hereby certifies that he caused a copy of the Notice of Motion and Defendants' Rule 16 Motion to Simplify Issues With Respect to the Rule of Reason Trial to be served upon the attorneys of record electronically on this 8th day of December, 2011.

/s/ David C. Gustman
Attorney for Noranda, Inc., Falconbridge
Limited and NorFalco LLC